

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,

Plaintiff,

v.

CHINA NORTHEAST PETROLEUM HOLDINGS  
LIMITED; WANG HONGJUN, (a/k/a Hongjun  
Wang); JU GUIZHI (a/k/a Guizhi Ju); and JIANG  
CHAO (a/k/a/ Chao Jiang)

Defendants,

JIANG MINGFU (a/k/a Mingfu Jiang); and SUN  
JISHUANG (a/k/a Jishuang Sun),

Relief Defendants.

Case No. 12-CV-8696 (NRB)  
ECF Case

**MOTION FOR LIMITED RELIEF FROM DISCOVERY  
STAY AND FOR ISSUANCE OF SUMMONSES**

Pursuant to Rule 26 of the Federal Rules of Civil Procedure and for the reasons set forth in the accompanying memorandum, Plaintiff, the United States Securities and Exchange Commission, respectfully moves the Court for an order (i) authorizing the Clerk of the Court to issue additional summonses to Defendant Ju Guizhi (a/k/a Guizhi Ju) and (ii) granting leave to serve upon Defendants limited discovery requests in aid of serving Ms. Ju.

Dated: July 28, 2014

Respectfully submitted,

/s/ Alfred A. Day

Alfred A. Day

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 28, 2014, the foregoing document was filed through the Court's ECF system, and counsel has relied upon that system's service upon counsel of record.

/s/ Alfred A. Day